

## REMARKS

The Applicants have amended claims 1, 3, 12, and 27 to more particularly point out and distinctly claim that which Applicants regard as their invention, and have added claims 38-50.

**A. Claim Rejections Under 35 U.S.C. 102(e)**

The Applicants respectfully traverse the Examiner's rejection of claims 1-6 and 28-29 under 35 U.S.C. 102(e) as being anticipated by DiRienzo et al (US 6,076,066). In traversing the Examiner's rejection, the Applicants rely on the following excerpt from MPEP §2100:

A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. The identical invention must be shown in as complete detail as is contained in the ... claim.

(Citations omitted.)

With regard to independent claim 1 (once amended), the DiRienzo reference neither teaches nor suggests to one of ordinary skill in the art "a service station having a digital camera assembly that is removable from the service station for capturing information related to the customer concern and the captured information is automatically downloaded from the digital camera when the camera is returned to the service station." The DiRienzo reference neither teaches nor suggests *any* physical "station" for receiving a "removable digital camera assembly." In addition, this reference does not teach or suggest the "automatic" manner in which information that is captured within the digital camera assembly is downloaded to the service station upon returning the removable digital camera assembly to the station. The Examiner admits these deficiencies of the DiRienzo reference in paragraph 19 of his Office Action:

DiRienzo fails to disclose . . . a removable digital camera for capturing at least one image of a subject matter of the customer concern and automatically transferring the at least one image to the service computer when installed in the housing.

As illustrations of preferred embodiments portray in Figures 2a, 2b, 8 and 9, a unique electrical and physical compatibility exists between the service station unit and the camera assembly unit to support these novel and advantageous features of the Applicants' invention. Applicants have again amended claim 1 in an effort to more particularly point out and distinctly claim these and other novel aspects of their invention.

Applicant's contend that claims 2 through 6 are proper at least to the extent that they are dependent upon proper independent claim 1 (as twice amended). With particular regard to claim 3, the DiRienzo reference does not teach or suggest a scanner that is specially configured to acquire identifying indicia. Although the Examiner relies on the Abstract and C11 L13-29 of the DiRienzo reference, these portions do not describe a "scanner" or "identifying indicia" in any regard. C11 L63 of DiRienzo merely teaches a conventional scanner that is connected in a typical peripheral manner to a personal computer 210 for scanning an image into a digitized bit-map – not a scanning device that is specially configured to acquire an identifying indicia for the customer concern (e.g., an encoded vehicle identification number as recited in claim 4 and described as a preferred embodiment in the Applicant's specification on p. 17 ll. 13-19). Notably, the configuration recited in claim 4 (and dependent upon proper claim 3) is a functional aspect of the claimed invention for at least these reasons. "A claimed [invention that] describes structural and functional interrelationships between the [invention] and the computer software and hardware components which permit [the invention's] functionality to be realized [is] statutory." MPEP §2106.

With particular regard to claim 6, the DiRienzo reference merely discloses a typical computer-scanner arrangement in which the scanner 220 acts as a conventional peripheral of the personal computer 210. In contrast, claim 6 recites a scanner that is physically attached to, and interoperable with, the digital camera assembly (e.g., preferred embodiments shown in Figures 2a, 2b and 11 and described on pp. 17, ll. 3-29 and 21, ll. 18-29 of the Applicants' specification).

In addition to the Applicant's arguments above with regard to claims 4 and 5, the Examiner's rejection of similar claims 28-29 is improper because those claims depend upon independent claim 27 – a claim that was not rejected by the Examiner under 35 U.S.C. 102(e).

***B. Claim Rejections Under 35 U.S.C. 103, DiRienzo In View Of Bradbury***

The Applicants respectfully traverse the Examiner's rejection of claims 7-9, 13-14, 27, 30-32 and 36-37 under 35 U.S.C. 103 as being unpatentable over DiRienzo in view of Bradbury (US 5,442,512). In traversing the Examiner's rejection, the Applicants rely on the following excerpt from MPEP §2100:

To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. All words in a claim must be considered in judging the patentability of that claim against the prior art. If an independent claim is nonobvious under 35 U.S.C. 103, then any claim depending therefrom is nonobvious.

Assuming that DiRienzo and Bradbury *were* properly combinable, their combined teachings fail to teach or suggest the automatic downloading of captured digital information from the digital camera when the camera is returned to the service station, as discussed in greater detail above. Only the Applicants recognized the advantages of such a novel arrangement.

With particular regard to independent claim 27 (once amended), the combined references fail to teach or suggest (i) a removable digital camera configured to automatically transfer images to the service station when installed in the housing (as described in detail above), and (ii) a scanner attached to the removable digital camera for acquiring an identifying indicia of the subject matter of the customer concern and automatically associating the identifying indicia with the at least one image.

In the present response, the Applicants have again amended claim 27 to more particularly point out and distinctly claim that which they regard as their invention. Neither DiRienzo nor Bradbury teach a physical camera-scanner combination such as that recited in

claim 27. At most, Bradbury discloses conventional and separate peripheral interconnectivity between a scanner, camera and a computer 100. In contrast, the Applicants' invention is advantageous because a user of the Applicants' invention need not handle and manage two devices for acquiring information, but a single unitary device – increasing the user's efficiency in the field, reducing the size and weight of the service station, and reducing manufacturing cost.

In addition, DiRienzo and Bradbury fail to teach or suggest the automatic manner in which the identifying indicia is associated with the at least one image. Bradbury is directed toward a carrying case for a typical combination of computing devices. Nowhere does this reference teach or suggest any novel compatibility or interconnectivity among these devices. In particular, Bradbury fails to teach or suggest a scanner configured to automatically associate identifying indicia with a captured image. At most, DiRienzo suggests a manual process for embedding "comments" into a GIF or TIFF image file format (DiRienzo, C15 L 30-34) – not a camera-scanner arrangement for automatically doing so. The automatic "water marking" feature of the Applicants' invention is particularly advantageous over such manual methods for several reasons. For example, the automatic water marking does not require user intervention and thereby increases the efficiency of the Applicants' invention over prior art methods and systems. In addition, the elimination of user intervention to perform the water marking task eliminates the possibility of data entry errors by the user.

Claims 30 – 32 and 36 – 37 are proper at least to the extent that they depend from proper independent claim 27.

In addition to the traversal above, the Applicants' respectfully object to the Examiner's combination of DiRienzo and Bradbury. The Applicants rely on the following excerpts from MPEP §2100 in making this objection:

The mere fact that references can be combined or modified does not render the resultant combination obvious unless the prior art also suggests the desirability of the combination.

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The level of skill in the art cannot be relied upon to provide the suggestion to combine references.

(Emphasis in original.)

The Examiner improperly relies only on the level of skill in the art to combine DiRienzo and Bradbury, and cites no independent motivation to do so.

**C. Claim Rejections Under 35 U.S.C. 103, DiRienzo In View Of Bradbury In View Of Harvey**

The Applicants respectfully traverse the Examiner's rejection of claims 10-12 and 33-35 under 35 U.S.C. 103 as being unpatentable over DiRienzo in view of Bradbury (US 5,442,512), and further in view of Harvey (US 6,208,507 B1).

Applicants contend that claims 10-12 and 33-35 are proper at least to the extent that they depend upon amended independent claims 1 and 27, respectively, for the reasons indicated above.

In addition, Applicants object to the Examiner's combination of DiRienzo, Bradbury and Harvey. The Examiner improperly relies only on the level of skill in the art to combine DiRienzo and Bradbury, and cites no independent motivation to do so.

**D. Summary**

Applicants have made a genuine effort to respond to the Examiner's objections and rejections in advancing the prosecution of this case. Applicants believe all formal and substantive requirements for patentability have been met and that this case is in condition for allowance, which action is respectfully requested.

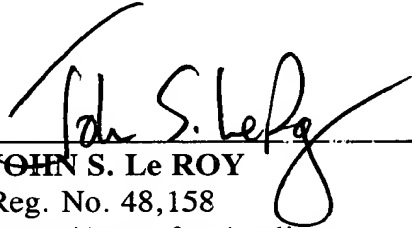
The Commissioner is authorized to charge the Petition fee of \$110.00 and \$84.00 for the presentation of 1 additional independent claim (total: \$194.00) to the deposit account of Applicants' Assignee, Ford Global Technologies, Inc., Deposit Account No. 06-1510. An addition copy of the first page of this paper is enclosed for that purpose.

The Examiner is requested to telephone the undersigned to discuss prompt resolution of any remaining issues necessary to place this case in condition for allowance.

Respectfully submitted,

**WILLIAM T. ROWSE ET AL.**

By

  
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Attachment

## VERSION WITH MARKINGS TO SHOW CHANGES MADE

**Please replace the paragraph beginning on page 21, at line 3 with the paragraph shown below:**

Referring now to Figures 10-15, a more detailed view of digital camera 134 with scanner unit 136 mounted thereto is illustrated, in accordance with the present invention. A top view of digital camera 134 is shown in Figure 10. On the top surface of digital camera 134 there is disposed a power button 350 for energizing digital camera 134. Further, an image capture button 352 is also disposed on the top surface of digital camera 134 for acquiring images through camera lens 354. Select button 355 and scroll button 356 are used to actuate and select various camera functions for operating camera 134. The top surface of digital camera 134 further includes a liquid crystal display 358 which communicates camera operation parameters to the camera user. Cables 160 and 162 electrically interconnect the digital camera 134 with the scanner unit 136.

Referring now to Figure 11, a front view of digital camera 134 and scanner unit 136 is illustrated, in accordance with the present invention. A front surface of digital camera 134 includes a flash 360 for illuminating the subject matter to be photographed. A view finder lens 362 allows the camera user to position the digital camera to compose the appropriate view of the subject matter to be photographed. Lens cap 355 protects the surface of camera lens 354. Scanner unit 136 includes a scanner engine which is capable of decoding a typical bar code disposed on the subject matter to be photographed for identifying same.

**Please replace the paragraph beginning on page 23, at line 4 with the paragraph shown below:**

Screw 388 secures the scanner unit 136 to a bottom surface of camera 134. Power indicator 390 is disposed on a rear surface of scanner unit 136 and indicates whether power is being provided to the scanner unit. Charge indicator 392 also disposed on the rear surface indicates whether the camera is being charged. Finally, charge level indicator 394 located above handle 398 indicates whether camera 134 is fully charged.

### **In The Claims**

1. (Twice Amended) A system for processing a product [customer] concern, the system comprising:

a service station having a first computer and a removable digital camera assembly[, wherein the digital camera assembly is removable from the service station] for capturing digital information related to the product [customer] concern [and] wherein the captured digital information is automatically transmitted from the digital camera to the first computer upon placing the digital camera in electrical communication with the first computer within the service station [downloaded from the digital camera when the camera is returned to the service station];

a reviewer station having a second computer for receiving the captured digital information from the service station and for determining how to address the [customer] product concern; and

a communication port for connecting the first computer at the service station with the second computer at the reviewer station for transmitting information related to the [customer] product concern including the captured digital information [therebetween].

Please cancel claim 2.

3. (Twice Amended) The system of claim 1 wherein the service station includes [comprises] a scanner for acquiring at least one identifying indicia.

12. (Twice Amended) The system of claim 11 wherein the plurality of terminals further comprises a second set of terminals for communication with a second set of camera terminals for transmitting data between the digital camera assembly and the first [a] computer [installed in the first recessed portion].

Please cancel claims 15-26.

27. (Twice Amended) A system for processing a product [customer] concern, the system comprising:

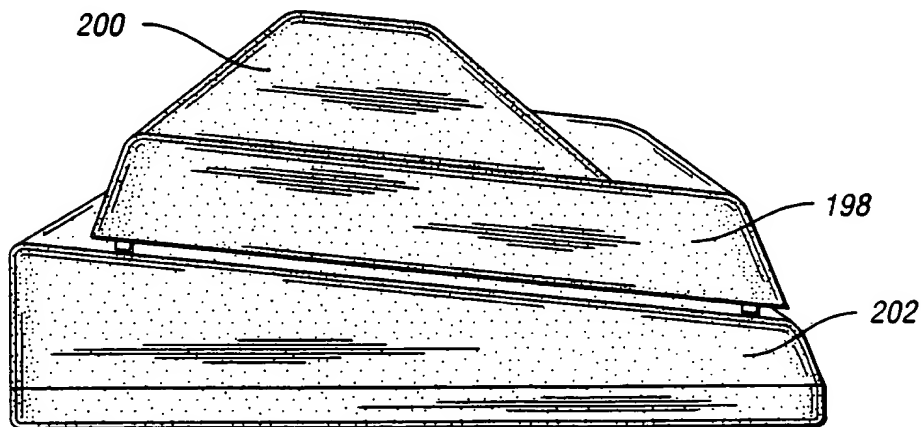
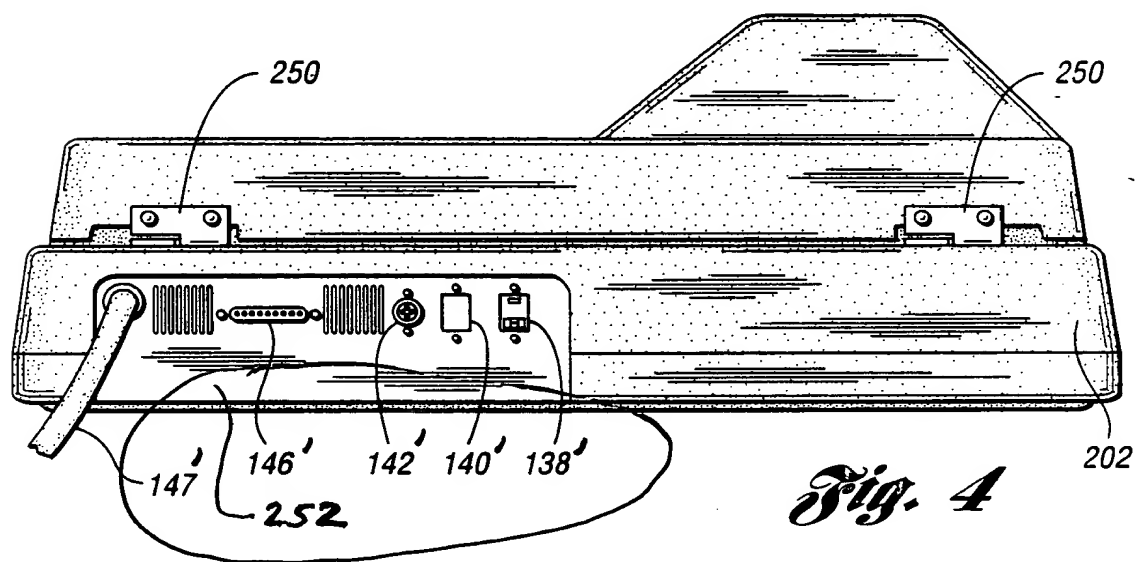
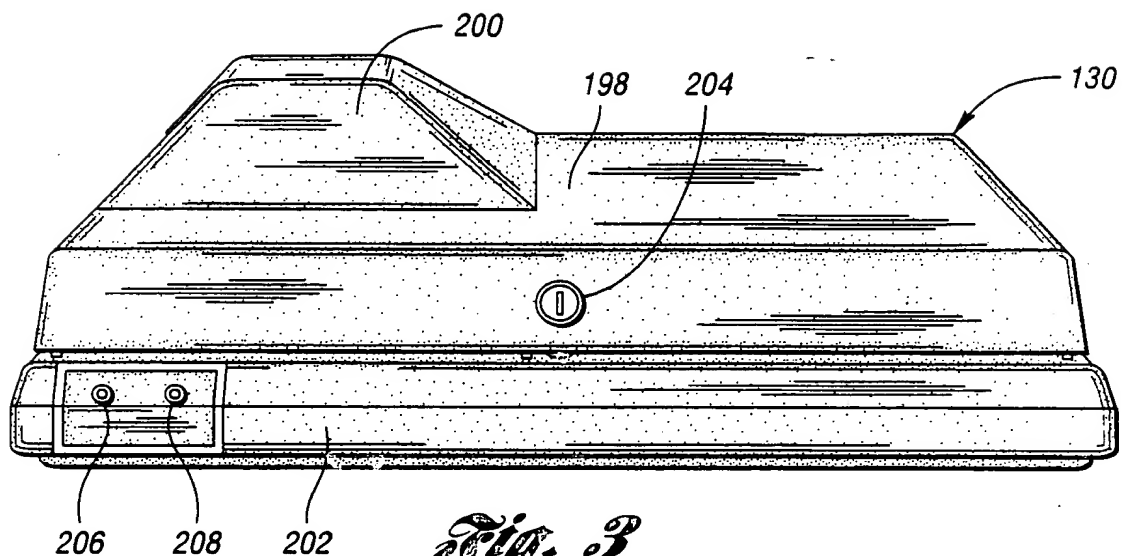


a housing having a removable service computer for receiving data indicative of a product [the customer] concern;

a removable digital camera for capturing at least one image of the product [a subject matter of the customer] concern wherein the service computer and digital camera are configured to automatically transmit the at least one image from the digital camera to the service computer upon placing the digital camera and the service computer in electrical communication [and automatically transferring the at least one image to the service computer when installed in the housing];

a scanner attached to the removable digital camera for acquiring an identifying indicia [of] for the [subject matter of the customer] product concern and automatically associating the identifying indicia with the at least one image; and

a remotely positioned reviewer computer for receiving the at least one image and associated identifying indicia from the service computer via a communication network to determine how to correct the product [customer] concern.



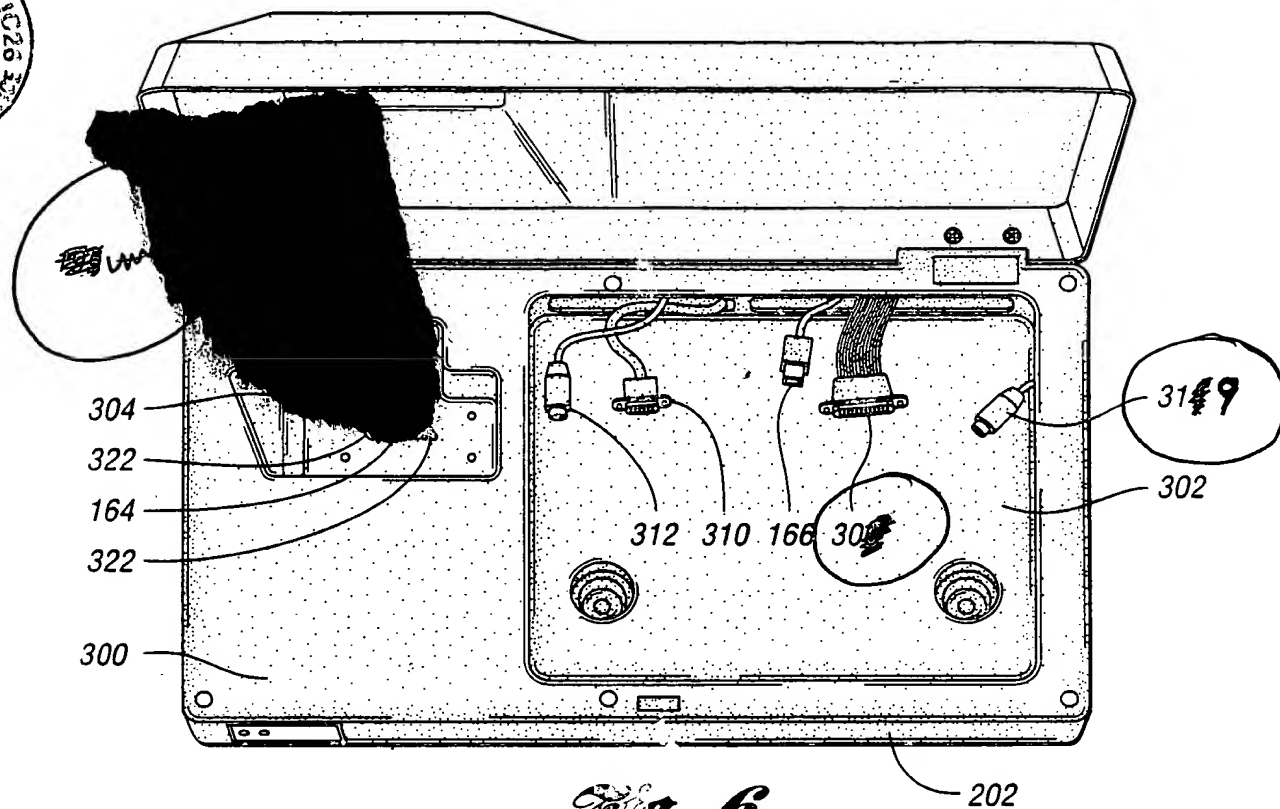
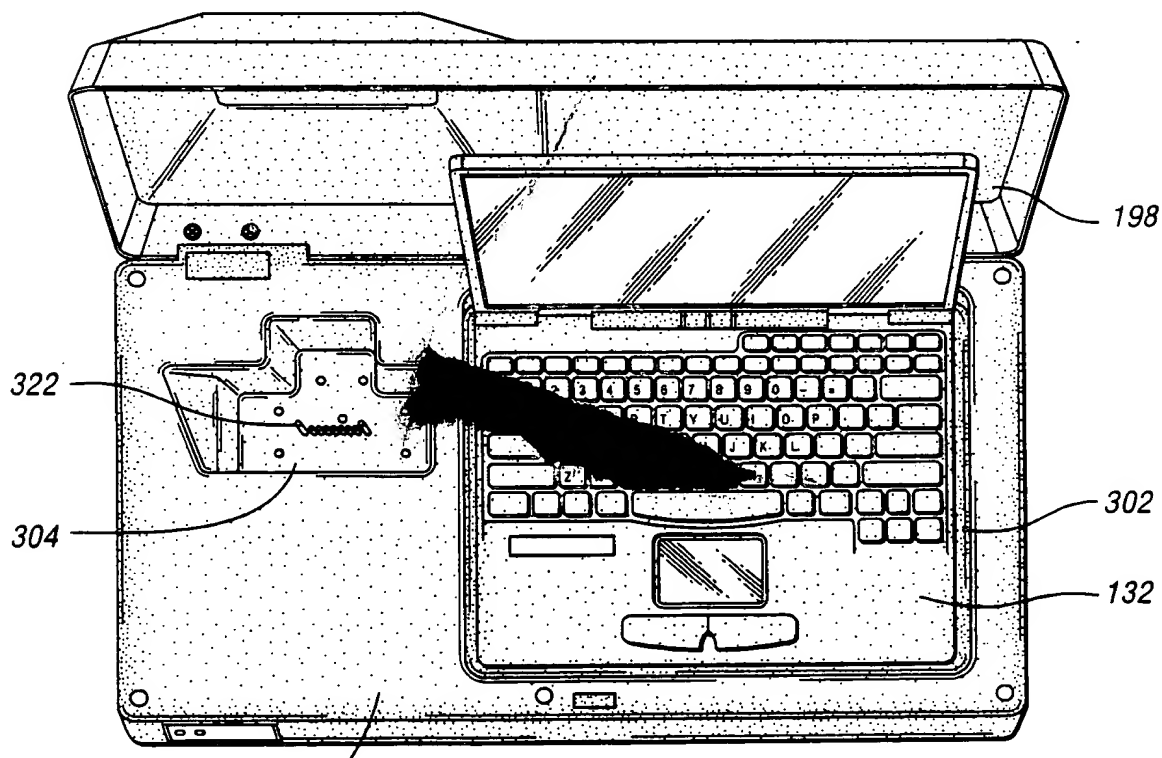
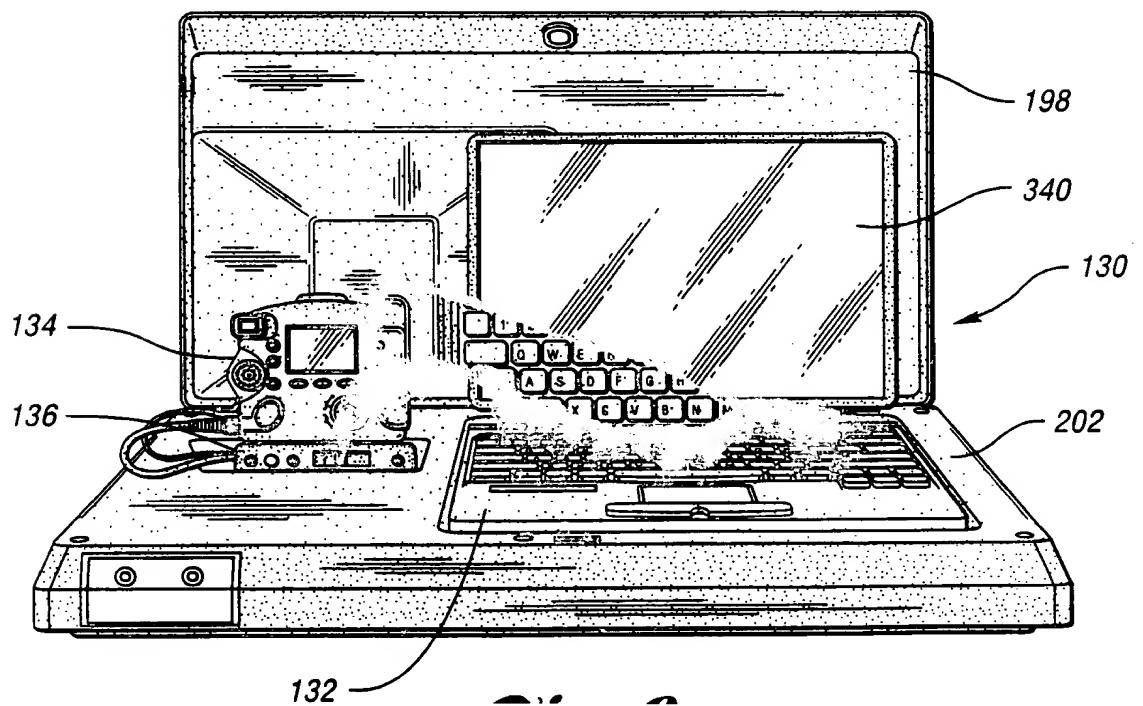
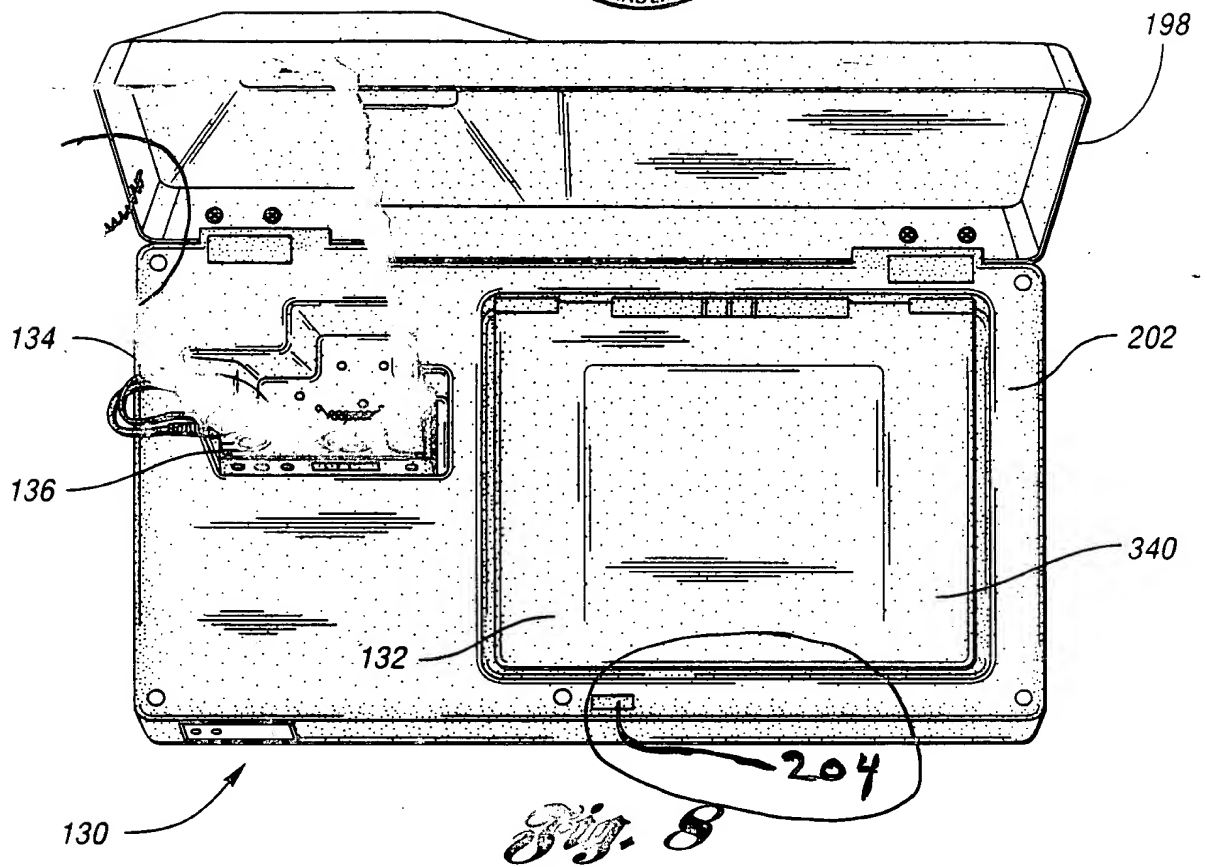
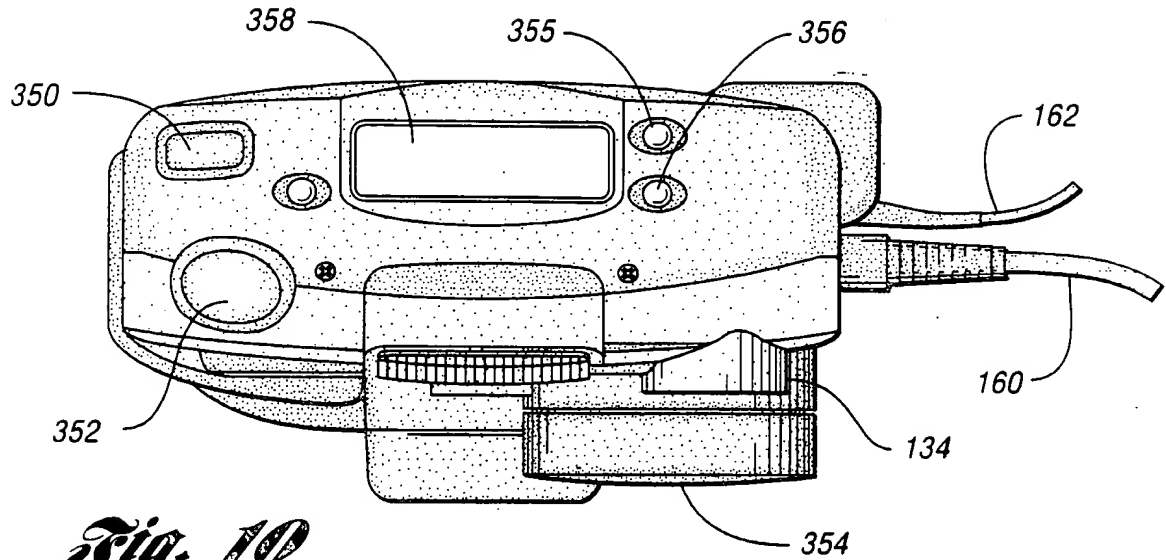


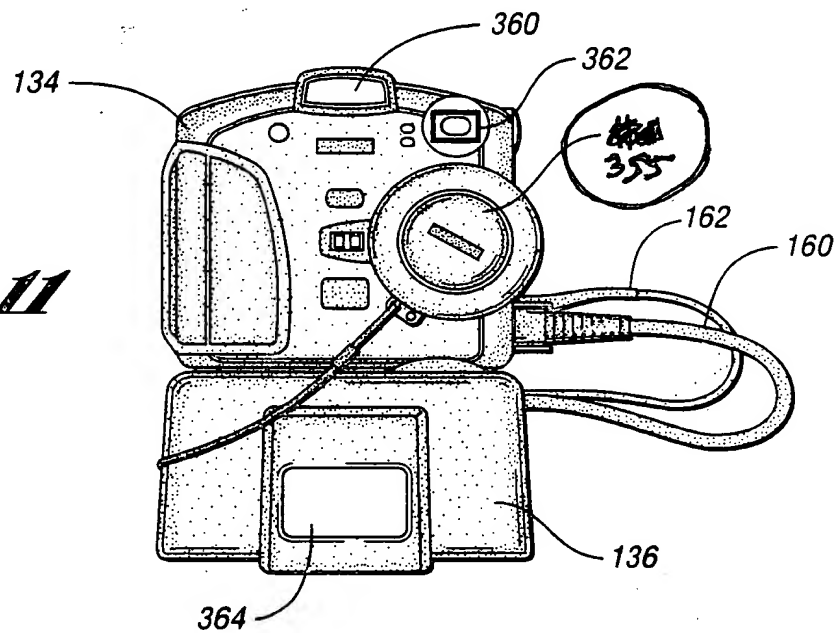
Fig. 6







*Fig. 10*



*Fig. 11*

*Fig. 12*

